



215 W. Philadelphia Avenue
Boyertown, PA 19512

610-404-4000
FAX: 610-367-1207

July 11, 2002

Ms. Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: CC Docket No. 94-102
Quarterly TTY Implementation Report
Conestoga Wireless Company

Dear Ms. Salas:

Conestoga Wireless Company ("Conestoga") hereby submits its quarterly report for July 2002 on implementation of TTY access to 9-1-1 over its digital wireless network, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102, released December 14, 2000. Conestoga is licensed to provide broadband PCS services in the following BTA markets:

Market	Block	Sub	Call Sign	Market Name
BTA360	C		WPOJ725	Pottsville, PA
BTA370	C	2	WPOJ726	Reading, PA
BTA429	C		WPOJ727	State College, PA
BTA437	C		WPOJ728	Sunbury-Shamokin, PA
BTA475	C		WPOJ729	Williamsport, PA
BTA360	D		KNLF905	Pottsville, PA
BTA370	D		KNLG701	Reading, PA
BTA437	D		KNLG945	Sunbury-Shamokin, PA
BTA475	D		KNLG703	Williamsport, PA

Conestoga's digital wireless network is currently using GSM infrastructure equipment from Nortel Networks ("Nortel"). As a result, Conestoga is dependent on Nortel for the development and testing of an acceptable digital TTY solution.

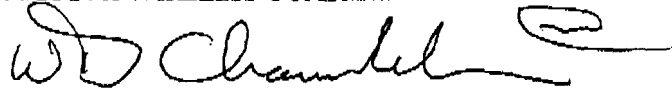
Because the necessary software for providing TTY capability on Conestoga's GSM network was not made generally available by Nortel until shortly before the June

30, 2002, compliance deadline, Conestoga filed with the Commission a request for limited waiver of the TTY implementation deadline.¹ As indicated in its waiver request, Conestoga is planning to install the GSM 13 base load software in September and expects all testing and optimization work to be completed no later than October 31, 2002.

It is Conestoga's understanding that Nortel will be filing an updated TTY capability status report through the TTY Forum. We therefore direct the Commission to Nortel's report for more specific information regarding the company's further TTY development and deployment activities.

Respectfully Submitted,

CONESTOGA WIRELESS COMPANY

A handwritten signature in black ink, appearing to read "W.D. Chamblin, III", with a stylized flourish at the end.

William D. Chamblin, III
President

¹ See Request for Limited Waiver of Conestoga Wireless Company, CC Docket 94-102, filed June 26, 2002.

**Conestoga Wireless Company
E911 TTY Device Capability Report for July, 2002**

I. DEVELOPMENT ACTIVITIES

- 1) **Network Infrastructure Software Development** – Conestoga’s digital wireless network is currently using GSM infrastructure equipment from Nortel Networks (“Nortel”). As a result, Conestoga is dependent on Nortel for the development and testing of an acceptable digital TTY solution. Because the necessary software for providing TTY capability on Conestoga’s GSM network was not made generally available by Nortel until shortly before the June 30, 2002, compliance deadline, Conestoga filed with the Commission a request for limited waiver of the TTY implementation deadline. As indicated in its waiver request, Conestoga is planning to install the GSM 13 base load software in September and expects all testing and optimization work to be completed no later than October 31, 2002.
- 2) **Handset Development and Testing Plans** – We are following the GSM handset development and interoperability testing that is being performed by VoiceStream Wireless. We are working with our suppliers to acquire these units as soon as possible.
- 3) **Beta Testing and Lab Testing** – Conestoga is a small carrier and is looking to its equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment. However, Conestoga will test the equipment it procures as soon as it is available, to make sure it meets the manufacturer’s specifications.
- 4) **Release and General Availability to Carriers of Network Infrastructure Software** – See answer to #1, above.
- 5) **Availability to Carriers of Full Digital Acceptance Test Units** – Unable to determine a firm date at this time with any manufacturer or vendor.
- 6) **Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY** – Dependent on handset vendors for enhanced TTY devices.
- 7) **Carrier Coordination of Testing with PSAP** – Conestoga is relying on the ATIS-sponsored TTY Technical Standards Incubator (TTSI) program to coordinate PSAP testing with the help of NENA and APCO.
- 8) **Carrier Testing Activities, Including Field Testing, Consumer and End-to-End Testing, and Other Necessary Tests** – Again, Conestoga is a small carrier, and is looking to its equipment manufacturers and nationwide carriers to conduct full beta and lab testing of network software, handsets and infrastructure equipment.
- 9) **Retail Availability of Necessary Consumer Equipment** – Retail availability will be implemented by Conestoga when compatible handsets are ready for rollout.

- 10) **Geographic Scope of Network Infrastructure Deployment** – Since our network has only one switch, as hardware become available, it will be deployed across our whole network. Likewise, as TTY compliant handsets become available we will offer them in all retail locations.